

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

**FRED HANEY, *et al.*,
individually, and on behalf of
all others similarly situated,**

Plaintiffs,

v.

**GENWORTH LIFE INSURANCE
COMPANY, *et al.*,**

Defendants.

Civil Action No. 3:22-cv-55

DECLARATION OF JESSE A. ROCHE, ESQUIRE

I, JESSE A. ROCHE, hereby declare under penalty of perjury that:

1. I am over eighteen years of age and fully competent to make this declaration. I have personal knowledge of all the statements made herein.

2. I, Jesse A. Roche, Esquire, am an associate in the law firm THORSENALLEN LLP, in Richmond, Virginia. I have been licensed to practice law in Virginia since October 31, 2011 (VSB No. 82579). I am admitted to all courts in the Commonwealth of Virginia, the United States District Courts for the Eastern and Western Districts of Virginia, and the United States Court of Appeals for the Fourth Circuit.

3. I have practiced in the United States District Court for the Eastern District of Virginia in Richmond, Virginia since 2011. My most recent experience includes, but is not limited to, co-counsel in *Cannada v. Old Dominion Brush Company, Inc.*, No. 3:20-cv-952, a case involving a claim under the Age Discrimination in Employment Act of 1967 (the “ADEA”). I have been selected to the “Virginia Rising Stars” list by *SuperLawyers* since 2018.

4. I have assisted James B. Thorsen, Esquire as co-counsel throughout this litigation.

5. The services rendered by Jesse A. Roche, Esquire on behalf of Objector, Jane Belkin (“Belkin”), relating to her objection to the Settlement Agreement between Plaintiffs, Fred Haney, Marsha Merrill, Sylvia Rausch, Stephen Swenson, and Alan Wooten (“Plaintiffs”) and Defendants, Genworth Life Insurance Company and Genworth Life Insurance Company of New York (“Genworth”) (collectively, the “Parties”), No. 3:22-cv-55, from September 21, 2022 to November 30, 2022, are as follows:


Attorney	Hourly Rate	Total Hours	Total Fee
Jesse A. Roche, Esq.	\$400.00	26.70	\$10,680.00

6. The services rendered by Jesse A. Roche, Esquire to Belkin included, but were not limited to, investigating facts of the case; reviewing the filed pleadings in this case; researching relevant case law; discussions with co-counsel regarding the law and potential relief for Belkin; preparing the Objection; participating in negotiations with defense counsel; researching and drafting the motion for incentive award and attorneys’ fees; reviewing the Joint Stipulation of Settlement with Objectors; and drafting declarations in support; among many other items incident to litigation. All of these services were in fact performed by Jesse A. Roche, Esquire. The specific services provided by Jesse A. Roche, Esquire are attached to this affidavit as Exhibit “A” and represent time up to November 30, 2022. The time set forth herein in Exhibit “A” was recorded contemporaneously with the work being done.

7. The legal fee of Jesse A. Roche, Esquire, listed above, is the market rate fee for an associate attorney with similar experience in Richmond, Virginia, in complex civil litigation cases. Said legal fees were necessary, reasonable, and not intentionally duplicative, and were incurred in representing Belkin’s interests in this matter.

8. The statements made herein are true and correct to the best of my present information and belief and with knowledge of the requirements for the filing of a request for attorney fees in federal statutory attorney fee cases as set forth by the United States Supreme Court in *Perdue v. Kenny A.*, 130 S. Ct. 1662 (2010), the Fourth Circuit Court of Appeals in *McAfee v. Boczar*, 738 F.3d 81 (4th Cir. 2013) and *Jones v. SouthPeak Interactive Corp. of Delaware*, 777 F.3d 658 (4th Cir. 2015), and by the United States District Courts for the Eastern District of Virginia in the cases of *Halcom v. Genworth Life Ins. Co.*, No. 3:21-CV-19, 2022 WL 2317435 (E.D. Va. June 28, 2022) and *Skochin v. Genworth Fin., Inc.*, No. 3:19-CV-49, 2020 WL 6536140 (E.D. Va. Nov. 5, 2020).

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct. Executed on this 30th day of November, 2022.



Jesse A. Roche, Esq.